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15 UNITED STATES DISTRICT COURT
16 SOUTHERN DISTRICT OF CALIFORNIA

17 APPLE INC.,
18 Plaintiff,
19 v.
20 WI-LAN, INC.,
21 Defendant.

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23
24
25 AND RELATED
26 COUNTERCLAIMS

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CASE NO. 3:14-cv-02235-DMS-BLM
(lead case);
CASE NO. 3:14-cv-1507-DMS-BLM
(consolidated)

**DECLARATION OF JACOB
ANDERSON IN SUPPORT OF APPLE
INC.'S SUR-REPLY IN OPPOSITION
TO DEFENDANT WI-LAN, INC.'S
MOTION TO COMPEL**

Dept: 13A
Judge: Hon. Dana M. Sabraw
Magistrate Judge: Hon. Barbara L. Major

1 I, Jacob Anderson, declare:

2 1. I am an associate with the law firm of DLA Piper LLP (US), counsel
3 of record for Plaintiff Apple Inc. (“Apple”) in this case. I have personal knowledge
4 of the facts set forth in this declaration and, if called as a witness, could and would
5 testify competently to these facts under oath.

6 2. Attached hereto as Exhibit K is a true and correct copy of excerpts of a
7 book titled “WiMAX: Standards and Security.”

8 3. Attached hereto as Exhibit L is a true and correct copy of a letter that
9 Drew Hollander sent me, dated November 14, 2017.

10 4. Attached hereto as Exhibit M is a true a correct copy of excerpts of
11 Defendant Wi-LAN Inc.’s Objections and Responses to Plaintiff Apple Inc.’s First
12 Set of Requests for Production, dated August 25, 2017.

13 5. Attached hereto as Exhibit N is a true and correct copy of a letter that
14 Kevin Schubert sent me, dated November 10, 2017.

15 I declare under penalty of perjury under the laws of the State of California
16 and the United States of America that the foregoing is true and correct.

17 Executed on November 15, 2017 at San Diego, California.

18
19 /s/ Jacob Anderson

20 Jacob Anderson
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